

**TOMPKINS, McGUIRE, WACHENFELD & BARRY LLP**

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*Attorneys for Aurora Loan Services LLC*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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In re:

Case No. 09-38410 (KCF)

JERRY M. and VANESSA TAYLOR,

CHAPTER 13

Debtors.

Hearing Date: August 25, 2010

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**NOTICE OF MOTION TO DISMISS BANKRUPTCY CASE**

TO:

Shmuel Klein, Esq.  
Attorney for Debtors  
113 Cedarhill Avenue  
Mahwah, NJ 07430

Albert Russo  
Standing Chapter 13 Trustee  
CN 4853  
Trenton, NJ 08650-4853

**SIRS:**

**PLEASE TAKE NOTICE** that on August 25, 2010 at 2:00 p.m., or soon as counsel may be heard, the undersigned, attorneys for Aurora Loan Services LLC ("Aurora"), will move before the United States Bankruptcy Court, The Honorable Kathryn C. Ferguson, presiding, U.S. Bankruptcy Court, 402 East State Street, Trenton, New Jersey for an order dismissing the Debtors' Chapter 13 bankruptcy proceeding, and

**PLEASE TAKE FURTHER NOTICE** that, in the event that timely objections are not filed with the Court and served upon the undersigned counsel as provided in D.N.J. L.B.R. 9013-1(a) and (f), the relief requested shall be deemed uncontested and the Court may, in its discretion, grant the requested relief.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested must be made in writing and in the form prescribed by the Federal Rules of Bankruptcy Procedure and the District of New Jersey Local Bankruptcy Rules, and must be filed with this Court not later than August 18, 2010, and personally served upon and received by counsel to Aurora, Tompkins, McGuire, Wachenfeld and Barry LLP, Four Gateway Center, 100 Mulberry St., Newark, New Jersey 07102, attn: Andrew P. Zacharda, Esq.

**PLEASE TAKE FURTHER NOTICE** that Aurora shall rely upon the Certification filed in support of the Motion and the record of the Proceedings.

**PLEASE TAKE FURTHER NOTICE** that the undersigned requests oral argument. A proposed form of Order is submitted as part of the Motion.

TOMPKINS, MCGUIRE, WACHENFELD & BARRY  
*Counsel for Aurora Loan Services LLC*

Dated: August 4, 2010

By: /s/ Andrew P. Zacharda  
ANDREW P. ZACHARDA